

ROBERT HAWKINS #131159
CHAPTER 7 TRUSTEE
1849 NORTH HELM, SUITE 110
FRESNO, CALIFORNIA 93727
(559) 255-0555

Chapter 7 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA**

In the Matter of

Case No. 11-11478-B-7F

ALLAN ARMSTRONG and
MARLIS ARMSTRONG,

DC No. RHT-1

**TRUSTEE'S MOTION FOR
AUTHORIZATION TO SELL
MOBILE HOME**
11 U.S.C. §363

Debtors.

Date: October 12, 2011
Time: 10:00 a.m.
Dept: B

**TO THE HONORABLE W. RICHARD LEE, UNITED STATES BANKRUPTCY
JUDGE:**

Robert Hawkins respectfully represents:

1. He is the duly appointed, qualified, and acting trustee of the above-entitled estate.
2. The above-captioned case was filed under Chapter 7 on or about February 8, 2011, and Robert Hawkins was appointed Chapter 7 Trustee.
3. This Court has jurisdiction over this proceeding by virtue of 28 U.S.C. §1334(a). This is a "core" proceeding pursuant to 28 U.S.C. §157(b)(2)(A). This motion is brought pursuant to 11 U.S.C. §363.
4. Among the assets of this estate is a 1961 Skyline Mobile Home, located in a mobile home park at 190 Main Street, Space 8, Morro Bay, California with a fair market value of approximately \$40,000.00.

5. The Trustee has received an offer from Leslie Essenwanger Cheramy to purchase the mobile home for the total sum of \$40,000.00.

6. In deciding to accept the proposed offer, the Trustee took into consideration the fair market value of the mobile home and that the offer is for a cash sale, as financing is unavailable due to the age of the mobile home.

7. The Trustee has agreed to pay a commission in the amount of ten percent (10%) of the purchase price to Franklin Real Estate & Rentals in connection with this sale.

8. The Trustee has reviewed a Title Search provided by the Department of Housing and Community Development and is informed and believes that there are no known liens against the mobile home. The Trustee is further informed and believes that the mobile home is co-owned by Sandy Collum who holds a one-third (1/3) interest and that she consents to the sale. After payment of ordinary costs of sale and the co-owner's one-third (1/3) of the net sale proceeds, the Trustee expects the bankruptcy estate to net approximately \$23,000.00 from the sale.

9. The Trustee believes that sale of the above-described property on the terms set forth above is in the best interest of the creditors of this estate and all parties in interest.

WHEREFORE, the Trustee prays that after appropriate notice and opportunity to be heard, he be authorized to sell the above-described asset to Leslie Essenwanger Cheramy for the total sum of \$40,000.00.

DATED: SEPTEMBER 8, 2011

/S/Robert Hawkins
ROBERT HAWKINS,
Chapter 7 Trustee